From:	MCCLINCY Matt
To:	Eric Blischke/R10/USEPA/US@EPA; Wyatt, Robert; Jim.McKenna@portofportland.com; Applegate, Rick; Chip Humphrey/R10/USEPA/US@EPA; Kristine Koch/R10/USEPA/US@EPA; Sanders, Dawn
Cc:	ANDERSON Jim M; JOHNSON Keith; TARNOW Karen E; ROICK Tom
Subject:	RE: Portland Harbor Stormwater
Date:	10/31/2006 08:58 AM

Eric,

DEQ is available to meet this Thursday from 1 to 3 pm. We have a room available at NWR if you want to meet here.

Matt McClincy

-----Original Message-----
From: Blischke.Eric@epamail.epa.gov
[mailto:Blischke.Eric@epamail.epa.gov]
Sent: Monday, October 30, 2006 2:57 PM
To: Jim.McKenna@portofportland.com; ricka@bes.ci.portland.or.us; rjw@nwnatural.com; ANDERSON Jim M; JOHNSON Keith
Cc: Humphrey.Chip@epamail.epa.gov; Koch.Kristine@epamail.epa.gov; voster@anchorenv.com; TARNOW Karen E; DAWNS@BES.CI.PORTLAND.OR.US
Subject: Portland Harbor Stormwater

All, in light of our October 26, 2006 meeting to discuss the stormwater pathway at the Portland Harbor site, I wanted to outline where I think we are and what I think is needed to move this process forward. I would like to set up a management team meeting this Wednesday or Thursday to discuss further.

Going back to EPA's December 2, 2005, Identification of Round 3 Data Gaps memo, EPA made the following statements regarding contaminant loading and stormwater:

1) Understanding contaminant loading is critical to the Portland Harbor RI/FS. To understand the impact of contaminant loading, a contaminant fate and transport model and estimates of upland and upstream loading are required (See section 2.1 of Round 3 Data Gaps Memo).
2) Surface water data will be needed at sites where PBTs are present above criteria or where additional data to understand loading to surface water is required. This information will be used to support the fate and transport model, food web model (predict fish tissue concentrations in response to remedial measures to address sediment contamination) or to support TMDL-like efforts aimed at source control efforts (this data collection effort will be taking place this fall; see Section 3.1.4 of the Round 3 Data Gaps Memo).
3) Stormwater is expected to be a significant source of contamination to Portland Harbor. Contaminant loading data will be required to support the fate and transport model, food web model and evaluate the potential for recontamination. Due to the large number of outfalls present within the Portland Harbor Study Area (more than 300 private and municipal outfalls have been identified to date), a comprehensive plan for characterizing a stormwater outfalls and developing stormwater loading estimates should be developed and implemented as part of upland source control efforts (see Section 3.2.2 of the Round 3 Data Gaps Memo).

As articulated above and as I stated in Thursday's meeting, I believe that loading data is needed to make some source control decisions and, as a result, the collection of this information is generally an upland source control data collection task. I believe this the underlying premise of the joint EPA, DEQ and City of Portland meetings we have held over the past few months. I acknowledge that arguments can be made to support the collection of this data as part of the Portland Harbor RI/FS (e.g., the data is needed for contaminant fate and transport evaluations to support the PH RI or recontamination potential evaluation to support the PH FS). However, I want to make my position clear that I believe this is fundamentally a source control data collection effort.

Despite my assertions, it is clear that others feel that the collection of the upland data is more a in-water RI/FS data collection need than a upland data collection. I would like to put this discussion aside and focus our discussion on what is the most expedient way for the data to be collected given what is currently on the table.

Here's where I think we are:

DEQ has been pursuing a comprehensive stormwater evaluation to be implemented at a number of upland facilities during the 2006/2007 water year.. Although certain elements of this data collection effort are unclear (e.g., which outfalls, what analytical methods, specific sampling methodology), my understanding is that this data will be collected at approximately 30 sites for which the stormwater pathway is a key pathway and that the sampling will include the collection of sediment trap solids and whole water samples. Whole water sampling will include the collection of four grab samples during 4 different storm events. Presumably, the whole water sampling will include both total and dissolved concentrations.

In addition to the upland work described above, DEQ is also working with the City of Portland to collect data from a range of outfalls during the 2006/2007 water year. Although the outfalls to be sampled have not been

finalized, they will include a mix of high priority outfalls for which flow-weighted composite sampling (3 storms) will be performed and medium to low priority outfalls for which 4 grab samples will be collected from 4 different storm events.

The plan has been to use this information with the EPA fate and transport model developed by Bruce Hope and flow data generated by the City of Portland or a simple model based on land use to develop a preliminary understanding of relative contribution of stormwater. It has been my hope that this information will be used in conjunction with the next iteration of the contaminant fate and transport model (hybrid model) and the Round 2 Report to develop a plan for additional site characterization efforts during the 2007/2008 water year. However, during Thursday's meeting, it was pointed out by Keith Pine and Carl Stiver's, that it may not be possible to incorporate data collect during the 2007/2008 water year into the draft Portland Harbor RI.

So where does this leave us. A few things:

1) I do not believe it is appropriate to go full steam ahead into a data collection effort to be implemented by the LWG to support a stormwater loading evaluation for this water year. I do not believe there is sufficient time to get every thing agreed upon through the PH RI/FS process in time for data collection to take place this year. Keep in mind that the LWG is fully engaged in the development of the Round 2 Report and that EPA and its government partners will be reviewing data in preparation for the delivery of the Round 2 Report. Perhaps more importantly, without the benefit of preliminary stormwater data and the Round 2 Report, I am not sure we know all the right questions to ask.
2) I believe that there is some flexibility with respect to the project schedule. For example, it could be that some of the data to be collected during the 2007/2008 water year may better support the FS or source control efforts and not the RI Report. Another option may be to not include the 2007/2008 water year data may in the draft RI report but include it in the final RI report.
3) I believe that there is an opportunity to supplement the DEQ program with an enhanced version of the current City of Portland proposal. For example, target a better range of outfalls to ensure a more representative mix of land use and industrial properties. The proposals received from the City and the LWG last week are a good starting point for this.
4) I also believe that there is an opportunity to supplement the DEQ and City of Portland programs with data collected by a number of other large property owners or unique industry types not currently targeted. It would seem fairly straight forward to ensure that certain LWG members such as the Port of Portland, Gunderson, Rhone Poulenc, Arkema and OSM are included. It may be more problematic to ensure that non-LWG members such as Schnitzer and Mar Com are included.

I think that we have an opportunity to build on the DEQ upland, City of Portland and LWG proposals to get the data we think necessary to support an initial evaluation (perhaps good enough for the RI) this water year and get additional data to support the FS and source control efforts during the 2007/2008 water year. Let's see if we can figure this one out.

Thanks, Eric